



FEDERAL ELECTION COMMISSION
Washington, DC 20463

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MEMORANDUM

TO: The Commission

FROM: Daniel A. Petalas *DAP*
Acting General Counsel

Kathleen M. Guith *KG*
Deputy Associate General Counsel for Enforcement

SUBJECT: MUR 6215 (Friends for Harry Reid)
Recommendation to Close the File

BACKGROUND

The Complaint in this matter alleged that Tate Snyder Kimsey Architects, Ltd. ("TSKA") violated the Federal Election Campaign Act of 1971, as amended, by coercing its employees to make contributions to a fundraiser for Friends for Harry Reid (the "Committee") and reimbursing contributions.¹ The Complaint further alleged that TSKA informed the Committee that two contributors were TSKA employees when they were not and that this information appeared in reports filed with the Commission.² The Commission previously disposed of all violations alleged in the Complaint and closed the file in this matter as to 15 Respondents.³ The file remains open only as to the Committee, which was initially notified as a result of its receipt of the reimbursed contributions and subsequently concerning TSKA's logistical assistance in hosting the fundraiser.⁴

¹ Compl. at 1-2 (Sept. 28, 2009).

² *Id.* at 2.

³ The Commission successfully conciliated with TSKA and Kimsey for violations of 2 U.S.C. §§ 441b, 441c, and 441f (now 52 U.S.C. §§ 30118, 30119, 30122) and 11 C.F.R. § 114.2 and closed the file as to them. *See* Memorandum to the Commission, MUR 6215 (Oct. 6, 2010); Commission Certification, MUR 6215 (Oct. 15, 2010). The Commission also dismissed the allegations as to three individual respondents, found no reason to believe as to ten 10 other individual respondents, and closed the file as to all of them. *See* First GCR at 15-16, MUR 6215 (May 12, 2010); Commission Certification ¶¶ 3-5, 13, MUR 6215 (July 20, 2010). The Commission lost its quorum in this matter in February 2013, and regained it in late October 2013.

⁴ *See* Certification, MUR 6215 (Aug. 12, 2010). Regarding its receipt of the contributions addressed in the Complaint, the Committee represents that it was unaware of any reimbursements and took steps to remedy its receipt of reimbursed contributions. *See* Reid Comm. Resp. at 3 (Dec. 3, 2009). We are aware

1 Because the Commission previously disposed of all of the Complaint's alleged
2 violations, we recommend that the Commission administratively close the file.⁵

3
4 **RECOMMENDATIONS**

- 5 1. Close the entire file; and
6 2. Approve the appropriate letters.

of no facts suggesting it may have "knowingly accepted" the reimbursed contributions alleged in the Complaint. 52 U.S.C. § 30122. The assistance of TSKA in planning and hosting the fundraiser is now outside the limitations period.

⁵ See Certification, Pre-MUR 531(Cora Carper) (Aug. 2, 2013) (administratively closing the file as to an internally generated respondent); Certification, MUR 6475 (Andrew J. McCrosson, Jr.) (July 17, 2014) (administratively closing entire file following ADRO resolution concerning remaining respondent).